

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MARYLAND SHALL ISSUE, INC., *et al.*,)
)
Plaintiffs,)
)
v.) Case No. 8:21-cv-01736-TDC (L)
) Case No. 8:22-cv-01967-DLB
MONTGOMERY COUNTY, MD.,)
)
Defendant.)

DECLARATION OF DAVID S. SUSSMAN

COMES NOW, the declarant, DAVID S. SUSSMAN, and hereby solemnly declares under penalties of perjury and states that based upon personal knowledge that the contents of the following declaration are true:

1. My name is DAVID S. SUSSMAN, and I am member of Maryland Shall Issue, Inc., a plaintiff in the above-captioned matter. I am an adult over the age of 18, a Maryland resident and I am fully competent to give sworn testimony in this matter.

2. I am a retired US Army Officer with multiple overseas deployments. I serve as the volunteer Director of Security and Safety for a Montgomery County synagogue. I initially received my restricted Maryland Wear and Carry Permit exclusively for the purpose of performing my security duties at my synagogue as was specifically identified on that initial permit. I have since been approved for an unrestricted Maryland Wear and Carry Permit that I now hold.

3. We have a small congregation that chooses not to expend its limited budget to hire either off-duty Police Officers or other security services more than is necessary. Because I am a member of the congregation, I am more familiar with the other members, and more aware of what “normal” looks like. I and others like me are the overall best security solution for our

1 congregation at this time of increased hate and violence against the Jewish community and other
2 communities of faith.

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4 4. As a result of the recent law passed in Montgomery County, I am concerned
5 about the lack of clarity as to whether I can lawfully continue to possess a firearm to protect myself
6 while performing overwatch and security duties at my synagogue, which could render the members
7 of my congregation unprotected.

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9 5. I hereby declare and that the factual allegations in the complaint that relate or
10 refer to myself and MARYLAND SHALL ISSUE, INC., are true.

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13 Dated this day of November 30, 2022:
14 DAVID S. SUSSMAN
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